



Daniel  
Duncan/R10/USEPA/US  
07/13/2006 03:09 PM

To "Leber, Bud" <Bud.Leber@kaisertwd.com>  
cc  
bcc  
Subject Re: Kaiser DC 4 Cleanup

Bud:

Here are our comments:

In 40 CFR 761.30(p), the regulations provide for two options after cleaning:

(iii) After accessible surfaces have been cleaned according to paragraph (p)(1)(ii) of this section and for all surfaces inaccessible to cleanup:

(A) The surface is completely covered to prevent release of PCBs with:

(1) Two solvent resistant and water repellent coatings of contrasting colors to allow for a visual indication of wear through or loss of outer coating integrity; or

(2) A solid barrier fastened to the surface and covering the contaminated area or all accessible parts of the contaminated area. Examples of inaccessible areas are underneath a floor-mounted electrical transformer and in an impassible space between an electrical transformer and a vault wall.

The regulations do not provide an option for a coating with a single color in 40 CFR 761.30(p)(1)(iii)(A)(1). In accordance with the regulations at 40 CFR 761.30(p)(1)(iii)(A)(2), Kaiser Aluminum may provide a solid barrier over the contamination and the single color paint.

I will be working off-site on Friday, July 14th. Please contact me on (b) (6) on Friday, July 14th or at (206) 553-6693 on Monday, July 17th if you wish to discuss this further.

From the Desk Of:  
Daniel L. Duncan  
Office of Compliance & Enforcement

(206) 553-6693  
(206) 553-1775 (FAX)

"Leber, Bud" <Bud.Leber@kaisertwd.com>



"Leber, Bud"  
<Bud.Leber@kaisertwd.com>  
07/12/2006 07:15 AM

To Daniel Duncan/R10/USEPA/US@EPA  
cc  
Subject Kaiser DC 4 Cleanup

Dan,  
Just wanted to check and see if there was anything else you needed with  
respect to the draft letter I sent to you for comments.  
Best regards,  
Bud Leber

Bernard P. (Bud) Leber, Jr.  
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Kaiser Aluminum  
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